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April 21, 2016

**ECF-Filed & Faxed**

The Honorable Frank Maas  
United States Magistrate Judge  
U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Kriss et al. v. Bayrock Group et al.*  
**Civil Docket No: 10 Civ. 3959 (LGS) (FM)**

Dear Judge Maas:

We represent Plaintiffs Jody Kriss and Michael Chu'di Ejekam in the above-referenced matter. In a telephone conference convened by the Court on October 6, 2015 (the "October Conference"), Your Honor advised counsel for Defendant Felix Satter (a/k/a Felix Sater) that his client cease his harassment of Mr. Kriss. (*See* 10-CV-3959 ECF Nos. 192-195 (Transcript is ECF No. 195)). Unfortunately, we must bring to your attention the fact that Satter, and possibly other defendants in this action, have recently engaged in extortion against our clients seeking either to obtain a voluntary withdrawal of this action, or to exact revenge upon them for having filed this action. I attach copies of recent correspondence received from Satter and possibly other defendants.

Plaintiffs believe that these recent actions constitute a violation by Satter of the Court's orders issued during the October Conference. Accordingly, Plaintiffs intend to seek orders holding him in criminal and civil contempt for his actions, and/or awarding them additional/alternative forms of relief. Plaintiffs do not believe that Satter and those assisting him should be permitted to conduct an illegal retaliatory campaign against Plaintiffs to obtain a result in this lawsuit. Plaintiffs submit that that campaign constitutes an affront to the Court. Plaintiffs also seek to conduct discovery concerning the threatening emails to determine whether other defendants are involved in the extortion of Messrs. Kriss and Ejekam.

Given the grave nature of these and other threats issued by Satter, Plaintiffs request that the Court schedule a conference call for tomorrow, Friday, April 21, 2016, or Monday or Tuesday, to address the recent activities described in this letter and how to proceed on Plaintiffs' request for contempt proceedings. Plaintiffs reserve the opportunity to provide the Court with additional information concerning the history of Satter's threats toward Plaintiffs in connection with this action.

Respectfully submitted,

/s/ J. Evan Shapiro

Bradley D. Simon

J. Evan Shapiro

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*Attorneys for Plaintiffs Jody Kriss and Michael  
Ch'udi Ejekam*